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Attorneys for Plaintiff and Counterdefendant UM
CORPORATION and Counterdefendant GOLDEN
MEDIA GROUP, INC. and TIGA
ENTERTAINMENT COMPANY, LTD.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

UM CORPORATION, a Japanese
corporation,

Plaintiff,

v.

TSUBURAYA PRODUCTIONS CO.,
LTD., a Japanese corporation,

Defendant.

Case No. 2:15-cv-03764-AB (AJWx)

**DECLARATION OF PERASIT
SAENGDUENCHAI IN SUPPORT
OF MOTION *IN LIMINE* NO 2 OF
PLAINTIFF AND
COUNTERDEFENDANT UM
CORPORATION AND
COUNTERDEFENDANTS GOLDEN
MEDIA GROUP, INC. AND TIGA
ENTERTAINMENT COMPANY,
LTD. FOR ORDER ALLOWING
USE OF FORMER TRIAL
TESTIMONY OF SOMPOTE
SAENGDUENCHAI PURSUANT TO
FED. R. EVID. 804(b)(1)**

AND RELATED CROSS-CLAIMS

Hearing Date: October 20, 2017
Hearing Time: 11:00 a.m.
Courtroom: 7B

Pretrial Conf.: October 20, 2017
Trial: November 7, 2017

DECLARATION OF PERASIT SAENGDUENCHAI

I, Perasit Saengduenchai, declare:

1. I am Chairman of plaintiff and counterdefendant UM Corporation.

Unless indicated otherwise, I have personal knowledge of the following facts, and if called as a witness I could and would testify competently to those facts.

2. I submit this declaration in order to provide further information concerning the health of my father, Sompote Saengduenchai.

3. My father lives in Thailand and is 75 years old. I am estranged from my father, and I have not spoken with him for several years.

4. Over the past several years, I have spoken to my sister Namphueng on a number of occasions about my father's health. Based on these conversations, I understand the following.

5. My father last traveled by airplane in 2015, when he made a trip to the United States. A few months after his return to Thailand, he attended a Thai court proceeding, after which he had problems walking to his car and required assistance. After that incident, he was confined to his bed for approximately a month and a half with stroke-like symptoms. At that time, the family began making funeral arrangements for my father. He started to slowly get better after a nurse began taking care of him at his house.

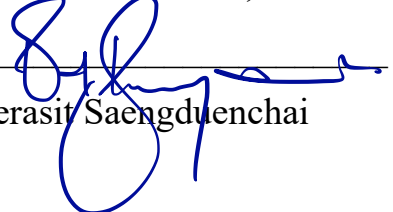
6. Although my father's health has improved somewhat since that incident, he is still suffering from significant inner-ear and balance issues, and a doctor has advised him that because of his health issues he should not travel by airplane.

7. I understand from Namphueng that, because of these health concerns, my father did not fly from Thailand to Japan – a six-hour flight – for a trip that he would have liked to have made. Namphueng has told me that my father is physically unable to take a 17-hour flight from Thailand to Los Angeles, and that

1 the family would not allow him to make that flight if he wanted to fly to Los
2 Angeles to testify for trial (which he does not).

3 I declare under the penalty of perjury of the laws of the United States of
4 America that the foregoing is true and correct.

5 Executed this 20 day of September, 2017, at Redondo Beach, California.

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